Message

From: Wagman, Michael [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=66B76ABF48A54C0AAE446FA3AE3C5614-WAGMAN, MICHAEL]
Sent: 1/7/2021 2:12:44 PM
To: Garber, Kristina [Garber.Kristina@epa.gov]
Subject: RE: FYI: bee risk assessment approach for aldicarb

Will do. Thanks Kris!

From: Garber, Kristina <Garber.Kristina@epa.gov>
Sent: Thursday, January 07, 2021 9:12 AM
To: Wagman, Michael <Wagman.Michael@epa.gov>
Subject: RE: FYI: bee risk assessment approach for aldicarb

Ex. 5 Deliberative Process (DP)

From: Wagman, Michael <Wagman.Michael@epa.gov>
Sent: Thursday, January 07, 2021 8:51 AM
To: Garber, Kristina <Garber.Kristina@epa.gov>
Subject: RE: FYI: bee risk assessment approach for aldicarb

Thank you for the really quick review Kris!

I'd like to get your thoughts on the fast-acting comment--here's the methomyl and oxamyl mortality tables from the ACO study reports. For oxamyl (2nd table), it looks like the mortality does occur really quickly. For methomyl (1st table), for the three lowest doses, it looks like mortality did not start until D7. Debating whether/how to best characterize that difference in the RA. Thanks in advance for any advice you can give!

Treatment group (Target dose)	Cumulative mortality [%]									
	E1	E2	E3	E4	E5	E6	E7	E8	E9	E10
Control(s):										
C	0.0	0.0	0.0	0.0	2.5	2.5	2.5	2.5	2.5	2.5
Reference item: Perfekthion [mg dimethoate/kg]										
0.9	0.0	0.0	2.5	27.5	40.0	87.5	97.5	100	100	100
Methomyl [µg/kg]										
312.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
625	0.0	0.0	0.0	0.0	0.0	0.0	7.5	20.0	20.0	20.0
1250	0.0	0.0	0.0	0.0	0.0	0.0	40.0	62.5	62.5	62.5
2500	5.0	20.0	45.0	47.5	52.5	57.5	72.5	72.5	72.5	72.5
5000	57.5	77.5	100	100	100	100	100	100	100	100

Oxamyl [mg a.s./kg]	Cumulative mortality [%]									
	E1	E2	E3	E4	E5	E6	E7	E8	E9	E10
C	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
1.13	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
2.25	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
4.5	0.0	0.0	10.0	10.0	12.5	12.5	12.5	15.0	17.5	17.5*
9	30.0	87.5	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0*
18	2.5	42.5	97.5	97.5	100.0	100.0	100.0	100.0	100.0	100.0*
R	0.0	0.0	0.0	5.0	17.5	37.5	62.5	80.0	90.0	97.5

From: Garber, Kristina <Garber.Kristina@epa.gov>
Sent: Thursday, January 07, 2021 8:38 AM
To: Wagman, Michael <Wagman.Michael@epa.gov>
Subject: RE: FYI: bee risk assessment approach for aldicarb

Thank you for incorporating my comments. nice job turning this assessment around so quickly.

From: Wagman, Michael <Wagman.Michael@epa.gov>
Sent: Thursday, January 07, 2021 8:17 AM
To: Garber, Kristina <Garber.Kristina@epa.gov>; Blankinship, Amy <Blankinship.Amy@epa.gov>; Federoff, Nicholas <Federoff.Nicholas@epa.gov>
Cc: Wente, Stephen <Wente.Stephen@epa.gov>; Milians, Karen <Milians.Karen@epa.gov>
Subject: RE: FYI: bee risk assessment approach for aldicarb

Amy, attached is the current draft, mostly ready for your review (there are still 2 comments Kris had on bringing in additional data from the chronic studies that I'm trying to look up).

Thanks,

Michael

From: Garber, Kristina <Garber.Kristina@epa.gov>
Sent: Wednesday, January 06, 2021 7:33 PM
To: Wagman, Michael <Wagman.Michael@epa.gov>; Blankinship, Amy <Blankinship.Amy@epa.gov>; Federoff, Nicholas <Federoff.Nicholas@epa.gov>
Cc: Wente, Stephen <Wente.Stephen@epa.gov>; Milians, Karen <Milians.Karen@epa.gov>
Subject: RE: FYI: bee risk assessment approach for aldicarb

I just completed my review. please let me know if you have any questions.

From: Wagman, Michael <Wagman.Michael@epa.gov>
Sent: Wednesday, January 06, 2021 3:02 PM
To: Blankinship, Amy <Blankinship.Amy@epa.gov>; Garber, Kristina <Garber.Kristina@epa.gov>; Federoff, Nicholas <Federoff.Nicholas@epa.gov>
Cc: Wente, Stephen <Wente.Stephen@epa.gov>; Milians, Karen <Milians.Karen@epa.gov>
Subject: RE: FYI: bee risk assessment approach for aldicarb

Internal and Deliberative

Attached is a streamlined bee risk assessment ready for your review. Thanks so much Kris for helping us work through this! Steve-I also have a question for you on the Koc extrapolation.

Thanks!!

Michael

From: Blankinship, Amy <Blankinship.Amy@epa.gov>
Sent: Wednesday, January 06, 2021 2:17 PM
To: Garber, Kristina <Garber.Kristina@epa.gov>
Cc: Wagman, Michael <Wagman.Michael@epa.gov>
Subject: RE: FYI: bee risk assessment approach for aldicarb

Thanks Kris.

From: Garber, Kristina <Garber.Kristina@epa.gov>
Sent: Wednesday, January 06, 2021 2:13 PM
To: Steeger, Thomas <Steeger.Thomas@epa.gov>; Sappington, Keith <Sappington.Keith@epa.gov>
Cc: Wagman, Michael <Wagman.Michael@epa.gov>; Blankinship, Amy <Blankinship.Amy@epa.gov>
Subject: FYI: bee risk assessment approach for aldicarb

Hi Tom and Keith,

ERB2 is currently working on a bee risk assessment for a NU on aldicarb (applications to FL citrus to control Asian citrus psyllid). At the last minute (the assessment needs to be signed tomorrow), they were asked to do a bee risk assessment

even though the Tier I data set is incomplete. I met with Amy and Michael and we determined the following path forward:

> To bridge the gaps for aldicarb, Michael will utilize Tier I toxicity data that are available for other structurally similar carbamate insecticides (i.e., oxamyl and methomyl). There is no chronic larval toxicity study available; however, since these chemicals are fast acting, the acute NOAEL will be used in place of a chronic NOAEL. BeeREX will be used to generate Tier I RQs for aldicarb. As a condition of registration, RD plans to call in confirmatory data for Aldicarb, including the full suite of bee data.

I wanted to make you aware of this approach. Please let me know if you have any questions or concerns.

Thanks,
Kris

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